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PLEASE REPLY TO WEST ORANGE

October 3, 2007

Federal Express
Muthu Sundram, Esq.
Assistant Regional Counsel
Office of Regional Counsel
US Environmental Protection Agency
Region II
290 Broadway, 17th Floor
New York, NY 10007

RE: ISP Environmental Services/LCP Chemicals Site

Dear Muthu:

As we discussed, enclosed please find a chronology of the LCP Chemical Site and draft questions addressed to specific PRPs for inclusion in initial and follow-up 104(e) requests regarding the LCP Chemical Site.

The requests include questions for the parties on which EPA has already served a 104(e) request and for new parties. ISP Environmental Services, Inc. ("ISP") believes the EPA currently has enough information from the evidence packages presented to you at our last meeting and from previous 104(e) responses to more than justify the service of Notice Letters on Union Carbide/Praxair, Kuehne Chemical Company and Dupont. We ask that you do so as soon as practical, in accordance with EPA Policy guidelines.

We have, however, enclosed potential new 104(e) questions herewith. For the parties already served with a 104(e) request, ISP has drafted more specific questions based on information submitted with the responses to the 104(e) requests and other information ISP has gathered regarding the Site. For the parties not yet served with a 104(e) request, ISP suggests that the EPA incorporate into the standard 104(e) request the questions ISP has included in the enclosed document for such parties.

Also enclosed, as per your request, is a chronology of (1) the ownership of the Site, and (2) the activities that took place at the Site. ISP is confident that this chronology, along with the dossiers already provided to the EPA, will allow the EPA to ensure that all parties responsible for the contamination at the Site are called upon to assist with the clean up.

Please contact me with any questions regarding the enclosed documents. Your prompt attention to this matter is greatly appreciated.

Very truly yours,

DENNIS M. TOFT

Enclosures

Chronology for LCP Chemicals Superfund Site

Date:	Description	Source
1928 to 1949	Dupont owned LCP Site.	
1928 to 1949	From 1928 to 1949, Dupont owned the LCP property and conducted filling on the property, black cinders were found in the fill.	Land Disposal Activity Sheet for the Dupont, Linden facility.
1940	Western portion of the LCP Site between railroad tracks is filled. Dupont owns LCP Site.	1940 aerial photo
1940	Area on LCP Site located immediately north of the railroad tracks and contiguous with the South Branch Creek is filled. Dupont owns the LCP Site.	1940 aerial photo
1947	South Branch Creek on LCP Site re-routed. Old alignment of South Branch Creek and area surrounding it are filled. Dupont owns the LCP Site.	1947 aerial photo
1947	Northwestern corner of LCP Site is filled. Dupont owns the LCP Site.	1947 aerial photo
9/15/49	GAF purchases LCP Site from Dupont.	Deed dated 9/15/49, deed book 1776, page 7.
1957 to 1990	Union Carbide leases property at the LCP Site from GAF, and later LCP. Union Carbide constructs and operates a hydrogen filling and repackaging plant, handling mercury in raw materials, product and waste streams; mercury waste disposed of in soils; groundwater and air releases; mercury contamination found throughout the leasehold; direct pipeline to mercury electrolysis unit operated by LCP.	Union Carbide's 104(e) response to the EPA.

1960 to 1964	In 1960, NOPCO purchased land adjacent to the LCP Site and built a toluene diisocyanate plant, which operated until September 1964. The NOPCO facility was located across from building 234 and the sludge lagoon located on the LCP Site.	
1965	Allied Signal purchases the NOPCO property.	
1972	Peter Kuehne, president and chief executive officer of Kuehne Chemical Company ("Kuehne"), is a founder of LCP.	Status Conference Memorandum filed in Linden Chemicals & Plastic, Inc. v. Kuehne Chemical Company, Inc., et al.
1972	LCP Chemicals buys the 26-acre LCP Site from GAF, and continues to operate the chlorine production facility until 1985.	1999 EPA ACO at ¶14.
1972	Kuehne holds an estimated 10% of the issued common stock in LCP.	Status Conference Memorandum filed in Linden Chemicals & Plastic, Inc. v. Kuehne Chemical Company, Inc., et al.
July 1972	Kuehne leases and operates a portion of the LCP Site from LCP, including, buildings 221 and 223.	7/21/72 Lease between LCP and Kuehne.
1972	Kuehne moves its manufacturing facilities from Elizabeth, New Jersey to Linden in order to be adjacent to the LCP facility so it can utilize the chlorine "tail gas" and caustic soda from the LCP process to manufacture sodium hypochlorite.	Status Conference Memorandum filed in Linden Chemicals & Plastic, Inc. v. Kuehne Chemical Company, Inc., et al.

1972	Kuehne operates at LCP site from 1972 to 1981, receiving chlorine "tail gas" and caustic soda via a pipeline from LCP to produce chlorine and sodium hypochlorite. High mercury contamination found on Kuehne leasehold, equipment and buildings.	1999 EPA ACO at ¶14. Kuehne's 104(e) Response to EPA.
1972	Kuehne and LCP enter into a sales contract for the purchase by Kuehne of chlorine "tail gas" and caustic soda. The agreement provides that LCP is responsible for disposing of any mercury residue in the chlorine tail gas and caustic soda furnished to Kuehne collected in Kuehne's equipment.	1972 Sales contract between LCP and Kuehne Chemical Company.
1972 to 81	Kuehne is hired by LCP to provide services to LCP, including loading and unloading tank trailers, railroad cars and barges with LCP's products (chlorine and caustic soda), and also to transport same.	Kuehne's 104(e) Response to EPA.
1972 to 1988	Union Carbide removes residual mercury in the hydrogen gas received from LCP by use of a "knockout trap". Approximately 5 pounds of mercury was collected daily. Union Carbide claims that the mercury collected was disposed of by being given to employees who allegedly sold it. Union Carbide has provided no information on the entities that either sold or purchased such mercury. Other mercury waste oils were released or buried on the Union Carbide leasehold as evident during remedial efforts.	Union Carbide's 104(e) Response to EPA.

1972 to 1988	Union Carbide buries mercury saturated activated charcoal/carbon filter media on the LCP Site.	During RI/FS, mercury contaminated activated charcoal/carbon filter media was found buried on the Union Carbide leasehold just outside the main production building. Such filter media was likely used by Union Carbide to remove mercury from the hydrogen gas prior to sale.
Sept. 1974	Kuehne applies for NPDES permit. The permit application indicates Kuehne has 40 employees on-site. The permit, # NJ0027707, to discharge cooling tower waters is eventually issued.	9/24/74 NPDES permit application to EPA.
1976	Kuehne and LCP enter into a profit sharing agreement where Kuehne agrees to manufacture sodium hypochlorite for the account of LCP and to deliver the same to LCP customers.	Status Conference Memorandum filed in Linden Chemicals & Plastic, Inc. v. Kuehne Chemical Company, Inc., et al.
1977	Kuehne and LCP enter into a sales contract for the purchase by Kuehne of chlorine "tail gas" and caustic soda. The agreement provides that LCP is responsible for disposing of any mercury residue in the chlorine and caustic soda furnished to Kuehne collected in Kuehne's equipment.	1977 Sales Contract between LCP and Kuehne.
1977	Kuehne operates a chemical resale business at the LCP Site. LCP sells to Kuehne all of Kuehne's chlorine requirements for resale to the market area served by Kuehne's Linden location. Kuehne also reselling caustic soda at a rate of approximately 500 tons per year.	1977 Sales Contract between LCP and Kuehne.
Aug. 1980	Kuehne is issued NPDES permit for cooling water discharge into Arthur Kill.	6/16/95 Site Inspection Report (Vol. 3 at 10).

Nov. 1980	Lease between LCP and Kuehne expires; LCP informs Kuehne it is a holdover tenant.	11/20/80 letter from LCP to Kuehne Chemical.
Nov. 1980	LCP files a Complaint against Kuehne alleging, among other things, that Kuehne "repeatedly violated Federal, State and City law, regulations and ordinances by the discharging of sodium hypochlorite into the waters of the state."	Complaint filed on November 3, 1980 in Linden Chemicals & Plastic, Inc. v. Kuehne Chemical Company, Inc., et al.
Dec. 1980	LCP informs NJDEP that it believes that Kuehne has illegally discharged effluent into the Arthur Kill.	12/2/80 NJDEP memo.
1981	LCP stops supplying, via pipeline, Union Carbide with hydrogen gas, which included mercury as a component.	5/5/98 Praxair Information Response to EPA.
1/8/81	NJDEP inspector notes a Kuehne violation of its NPDES #NJ0027707 surface water permit.	6/16/95 Site Inspection Report (Vol. 2 at 8)
1981	Kuehne informs NJDEP that LCP and Kuehne are "physically and economically entwined."	10/27/81 letter from Kuehne to the NJDEP.
1/17/81	Kuehne ceases operations at LCP site.	10/27/81 letter from Kuehne to NJDEP.
2/6/81	LCP files a complaint with the Linden Police Department claiming that LCP took samples of a groundwater stream that ran through its property and discovered a large volume of bleach and caustic soda. LCP stated it traced the problem to a sewer pipe from the Kuehne operations.	2/6/81 Linden Police Department Offense Report.
2/18/81	LCP informs NJDEP that there is leaching of caustic soda from contaminated soil in an area referred to by LCP as the "Kuehne dumping site."	2/18/81 letter from LCP to NJDEP.

Oct. 1981	NJDEP issues NOV to Kuehne Chemical regarding a violation of Kuehne's NPDES permit # NJ0027707. Kuehne is fined $17,500.	6/16/95 Site Inspection Report (Vol. 2 at 8).
Oct. 1981	Kuehne disputes NOV.	10/27/81 Kuehne Chemical letter to NJDEP.
Nov. 1981	NJDEP served with subpoena in Linden Chemicals & Plastic, Inc. v. Kuehne Chemical Company, Inc., et al.	11/5/81 NJDEP memo.
5/1/85	Lease between LCP and Union Carbide renewed.	5/1/85 Lease between LCP and Union Carbide.
5/1/85	Lease between LCP and Union Carbide states that Union Carbide has the right to maintain an iron pipe from the leased land to an existing ditch north of the leased land for the discharge of process water.	5/1/85 Lease between LCP and Union Carbide.
8/8/85	Union Carbide concludes that its process equipment and piping is contaminated with mercury.	8/8/85 Linde Gases Trip Report.
11/7/85	Memorandum states that Union Carbide had 17 drums of waste oil contaminated with mercury stored on the LCP Site.	11/7/85 Union Carbide internal memorandum listing inventory of items found on leasehold.
1987	Microcell Technologies begins leasing building 231 (until at least 1993).	RCRA Work Plan by Eder Associates at 3.
June 1987	Union Carbide decommissions certain idle equipment, including compressors, gas purification equipment and the gas supply pipeline from LCP. Waste containing mercury is found and hauled away by SCA. The building roof is also contaminated with mercury and removed.	5/5/98 Praxair Information Response to EPA.

6/11/87	IT Corporation ("IT") submits a proposal to Union Carbide for the sampling for mercury found on the roof of the Union Carbide facility located on the LCP Site.	6/11/87 IT proposal to Union Carbide – the company operating at the LCP Site was Linde Gases, the industrial gas operations of Union Carbide. In this chronology, "Union Carbide" will be used when referring to operations at the LCP Site during the Linde Gases time period.
8/6/87	IT writes to Union Carbide: "IT will send you a revised proposal to include removing the roof as contaminated. The pad and surrounding area should be considered contaminated with mercury."	8/6/87 IT letter to Union Carbide.
10/14/87	Union Carbide reports oil spills to NJDEP.	Linde Gases 10/19/87 Memo.
12/1/87	NJDEP issues NOV to Union Carbide for the oil spills. Union Carbide hires IT to excavate the oil contaminated soil at the waste oil storage area.	Attachment A to Praxair's 8/17/92 letter to NJDEP "Summary of Enforcement Actions for Violations of Environmental Laws".
12/3/87	Union Carbide writes NJDEP that "traces of mercury are present up to 16 ppm" on its leasehold.	Linde Gases 12/23/87 letter to NJDEP.
1988	During IT's excavation of soil contaminated with petroleum hydrocarbons on the Union Carbide leasehold, IT observes oil below the water table.	8/31/92 NJDEP memorandum.
1988	Union Carbide removes from the LCP Site two 4,000 gallon No. 2 fuel oil underground storage tanks and associated pump and piping.	August 1988 Report on the Excavation of Underground Fuel Oil Storage Tanks.
1988	IT finds an oil-like substance with a kerosene odor bubbling from the ground at the Union Carbide leasehold. IT states it is from an off-site source.	8/30/90 NJDEP Memorandum.

1/88	Union Carbide completes a form for Envirosafe Services of Ohio in which it states that soil removed from the LCP Site was contaminated with oil and mercury. According to the form, the oil leaked onto the soil over a number of years and the mercury resulted from hydrogen gas filling.	1/20/88 form to Envirosafe Services of Ohio.
4/1/88	Liquid Carbonic Carbon Dioxide Corp. leases property at the LCP Site for a carbon dioxide distribution terminal	4/1/88 Land Lease between LCP and LCCDC.
4/18/88	Union Carbide writes NJDEP to report the clean up of oil contaminated soil.	4/18/88 Linde Gases letter to DEP.
4/22/88	IT reports to Union Carbide that "thirty pounds of free mercury was collected" during the cleaning of compressor no. 3.	IT's 4/22/88 letter to Union Carbide.
5/1/88	Caleb Brett enters into lease agreement with LCP, for the storage of petroleum based products. Caleb Brett operates on LCP Site from 1988 to 1995 storing fuel products, asphalt products, pot ash and caustic soda.	3/23/98 Caleb Brett's response to EPA. 1999 ACO at ¶14.
7/88	IT conducts roof sampling of Union Carbide facility at the LCP Site and the results indicate high levels of mercury around two process vents. The mercury on the roof is the result of fugitive emissions from the Union Carbide operations.	8/6/87 results of roof sampling of Union Carbide facility.
7/22/88	IT manifests mercury contaminated debris from Union Carbide to SCA site in New York.	IT's hazardous waste manifests.
7/28/88	Bethlehem Apparatus confirms it has received 529.1 pounds of used mercury from Union Carbide.	Bethlehem's 7/28/88 letter to Union Carbide and Carbide's 8/29/88 invoice.

8/8/88	IT manifests mercury contaminated debris from Union Carbide to SCA site in New York.	IT's hazardous waste manifests.
9/15/88	Union Carbide releases hydrogen gas into the air when a safety valve blew off a truck; pays $1,000 penalty to NJDEP.	6/16/95 Site Inspection Report (Vol. 2 at 8); Attachment A to Praxair's 8/17/92 letter to NJDEP "Summary of Enforcement Actions for Violations of Environmental Laws".
12/18/89	Union Carbide fined $1,000 for its generator failing to obtain the signature of a hauler on manifest.	Attachment A to Praxair's 8/17/92 letter to NJDEP "Summary of Enforcement Actions for Violations of Environmental Laws".
1990	Active Water Jet, a pipe and machinery cleaning company, is a tenant and operator at the LCP Site. At some point in 1990, Active Water Jet stopped paying rent, but refused to leave the Site essentially squatting on the property for many years. Finally, after ten years of operating on the Superfund Site without paying any rent and discharging its cleaning water to the ground, in 2000, Active Water Jet moved its operations from the Site after ISP and EPA threatened to take legal action to remove them.	
2/28/90	NJDEP issues NOV to Union Carbide regarding Union Carbide's failure to obtain signature of hauler on manifest.	NJDEP's 2/28/90 NOV.
4/17/90	Union Carbide gives notice that it will cease it operations at LCP Site as of 6/15/90, triggering ECRA case no. 90367.	4/17/90 Linde Gases letter.
4/23/90	Union Carbide submits its GIS to NJDEP regarding the cessation of operations and assumption of lease by new tenant.	Linde Gases 4/23/90 General Information Submission (GIS).

8/31/90	Lease between Union Carbide and LCP terminates. Union Carbide sells its equipment and assets to Ultra Pure Gases, Inc. ("UPGAS"). LCP leases the same property to UPGAS for the same operations. The Union Carbide/UPGAS agreement divides the environmental responsibility between Union Carbide and UPGAS based on when each entity operated at the Site.	Union Carbide's 6/1/92 letter to NJDEP; and 8/31/90 Asset Purchase and Sale Agreement between UPGAS and Union Carbide.
Mar. 1991	The Remedial Investigation Report of Union Carbide sent to DEP identifies 10 contaminated areas of concern.	IT Corporation's Remedial Investigation Report, dated March 1991.
1991	IT identifies an abandoned cylinder caustic bath sump on the Union Carbide leasehold as an area of concern. The sampling conducted by IT indicates that the caustic solution had overflowed into the soil surrounding the sump and that the solution contained dissolved metals, which contaminated the soil surrounding the sump.	Cleanup Plan for Union Carbide facility at the LCP Site, prepared by IT Corporation, dated February 1993.
1991	IT identifies a non-contact cooling water sump on the Union Carbide leasehold as an area of concern. The sampling conducted by IT indicates that the non-contact cooling water, containing metals in solution, had overflowed and contaminated the soil surrounding the sump.	Cleanup Plan for Union Carbide facility at the LCP Site, prepared by IT Corporation, dated February 1993.

1991	IT identifies a truck/cylinder cooling water rinse station and runoff collection drum on the Union Carbide leasehold as areas of concern. The cooling water runoff from the rinse station discharged to a partially buried drum located on the property and referred to as the runoff collection drum. The sampling conducted by IT found metals and base/neutral organics in the soil surrounding the runoff collection drum.	Cleanup Plan for Union Carbide facility at the LCP Site, prepared by IT Corporation, dated February 1993
1991	The cooling water collected in the runoff collection drum located on the Union Carbide leasehold at the Site was pumped to a dry well on the Site. The dry well was constructed of cinder blocks extending to a depth of approximately three feet below grade the dry well drained to the ground in the surrounding area.	Cleanup Plan for Union Carbide facility at the LCP Site, prepared by IT Corporation, dated February 1993.
7/10/91	LCP files for Chapter 11 bankruptcy.	7/10/91 Bankruptcy petition.
10/21/91	Active Water Jet uses a portion of the LCP Site as a staging area. Active Water Jet washes its dirty equipment at the Site and probably the dirty equipment and pipes from its customers.	10/21/91 Letter from Union Carbide Industrial Cases to Ultra Pure Gases.
1992	Union Carbide transfers ownership of the industrial gas business to Praxair.	1990 AOC at p.4; Union Carbide's 4/8/98 letter to EPA.
6/30/92	Praxair signs ACO with NJDEP.	8/17/92 Praxair letter to NJDEP.

7/20/92	The NJDEP finds that "[m]etals contamination in excess of proposed non-residential cleanup standards in Areas A/B, D/G and F requires delineation and, at least, limited remediation. Off-site sources have not been demonstrated, and even if demonstrated, do not absolve Linde of the need to protect human health and the environment. A cap and deed restriction (provided property owner will accept one) seems likely for all or parts of this site."	NJDEP's 7/20/92 Memo re Linde Gases.
11/18/92	"Levels of metals in surface soil at areas D and F, and in sub-surface soil in areas A, B, D and F are several orders of magnitude above current non-residential guidance levels...The Department acknowledged that the clustering of most contaminated samples near the north side of the property seemed to support Linde's belief that contamination results from fill placed during construction of the adjacent railroad tracks." The area of the site referenced was filled during Dupont's ownership.	NJDEP's 11/18/92 Memorandum re Linde Gases.
5/25/93	Praxair enters into ACO and Standby Trust Agreement with NJDEP regarding former operations of Union Carbide at the LCP Site.	5/25/93 Standby Trust Agreement.
4/20/93	"Linde proposes capping to address metals contamination in soil, specifically, metals detected at Areas A. B. D/G and F."	NJDEP's 4/20/93 Memorandum re Linde Gases.
5/25/93	Praxair signs amended ACO regarding the Union Carbide leasehold and puts up Remediation Funding Source.	NJDEP's 6/20/95 letter.

4/4/95	LCP files Declaration of Environmental Restriction with Union County Clerk regarding capping of contaminants.	LCP 's Declaration of Environmental Restrictions, filed with the Clerk on April 4, 1995.
6/20/95	NJDEP issues No Further Action Letter to Praxair, for the leasehold area only: "This does not apply to the elevated metals contamination found during the background sampling which may be due to historic fill materials."	NJDEP's 6/20/95 NFA to Praxair.
7/27/98	LCP site placed on NPL.	1999 EPA ACO at ¶12.
1998	Kuehne submits 104(e) Response to EPA.	Kuehne's 104(e) Response to EPA.
1998	Union Carbide submits 104(e) Response to EPA.	Union Carbide's 104(e) Response to EPA.
1998	Caleb Brett submits 104(e) Response to EPA.	Caleb Brett's 104(e) Response to EPA.
1999	Praxair submits 104(e) Response to EPA.	Praxair's 104(e) Response to EPA.
1998	Dupont submits 104(e) Response to EPA.	Dupont's 104(e) Response to EPA.
2007	During RI/FS investigation, mercury contaminated activated charcoal/carbon filter media is found buried on the Union Carbide leasehold, just outside the main production building. Such activated charcoal/carbon was likely used by Union Carbide to remove the mercury from the hydrogen gas before sale.	
	Ashta Chemical is a potential LCP spin-off and may be viable company to pursue with respect to LCP's liabilities at the Site.	

	The Linden Roselle facility is adjacent to the Site. Linden Roselle's wastewater and stormwater discharges may have contributed to the contamination at the LCP Site.	

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MEMORANDUM

TO: Muthu Sundram, Esq.

DATE: October 2, 2007

SUBJECT: PRP Questions for EPA for LCP Site

I. The first set of companies listed received a 104(e) request from the EPA and the questions provided are follow up questions to the original 104(e) responses.

Kuehne Chemical

1. Describe the relationship between Kuehne Chemical Company ("Kuehne") and LCP Chemical Company ("LCP"). Identify in your answer:

   a. Any corporate relationship between Kuehne and its affiliates and LCP and its affiliates during any time period, including without limitation, any stock ownership or contractual relationship;

   b. Any officers, directors, employees, partners or shareholders (individual or corporate) who worked for or had interests in both Kuehne or its affiliates and LCP or its affiliates (either consecutively or simultaneously), together with a description of when and what these persons' relationships were with each company, including the person's job title and job description; and

   c. Any facilities or equipment that Kuehne owned, leased, installed or built at the site.

2. Did Kuehne ever own any stock in LCP, or did LCP ever own stock in Kuehne? If so, identify the amount and type of stock Kuehne or LCP owned and the time period during which stock was owned. Also, identify the method of disposition of such stock.

3. Was any corporate officer of Kuehne involved in any way in the creation of LCP or the purchase of the site or design of site machinery or processes? If so, identify the corporate officer, including that person's title, and describe, in detail, his/her involvement in LCP.

4. Provide process diagrams, site drawings, sewer and wastewater conveyance locations, discharge locations and other information showing the layout of the Kuehne leasehold

and the LCP site as a whole during the time Kuehne was present at the site, identifying which parts of the site were related to Kuehne and which to LCP.

5. Did the caustic soda Kuehne received from LCP during the time Kuehne operated at the LCP site contain mercury or other hazardous substances when received or when sold? If so, how much mercury or other hazardous substances did it contain?

6. Did Kuehne remove mercury or other hazardous substances from the caustic soda it received from LCP during the time Kuehne operated at the LCP site? If so, identify the quantity of mercury or other hazardous substances removed by Kuehne on a daily basis and how Kuehne removed and disposed of the mercury or other hazardous substances found in the caustic soda. If not, describe why it was unnecessary to remove the mercury or other hazardous substances from the caustic soda.

7. Prior to Kuehne receiving the caustic soda from LCP during the time Kuehne operated at the LCP site, did LCP remove mercury or other hazardous substances from the caustic soda? If so, identify the quantity of mercury or other hazardous substances removed by LCP on a daily basis and how LCP removed and disposed of the mercury or other hazardous substances found in the caustic soda?

8. Did Kuehne require LCP to remove mercury or other hazardous substances from the caustic soda LCP supplied to Kuehne during the time Kuehne operated at the LCP site? If so, describe why Kuehne needed LCP to remove such mercury or other hazardous substances. Did Kuehne's contracts with LCP or customers contain minimum specifications for mercury contamination? If so, identify the specifications and how they were calculated and enforced.

9. Did the chlorine tail gas LCP supplied to Kuehne during the time Kuehne operated at the LCP site contain mercury or other hazardous substances? If so, how much mercury or other hazardous substances did it contain?

10. Did Kuehne remove mercury or other hazardous substances from the chlorine tail gas it received from LCP during the time Kuehne operated at the LCP site? If so, identify the quantity of mercury or other hazardous substances removed by Kuehne on a daily basis and how Kuehne removed and disposed of the mercury or other hazardous substances found in the chlorine tail gas? If not, describe why it was unnecessary to remove the mercury or other hazardous substances from the chlorine tail gas.

11. Prior to Kuehne receiving the chlorine tail gas from LCP during the time Kuehne operated at the LCP site, did LCP remove mercury or other hazardous substances from the chlorine tail gas? If so, identify the quantity of mercury or other hazardous substances removed by LCP on a daily basis and how LCP removed and disposed of the mercury or other hazardous substances found in the chlorine tail gas?

12. Did Kuehne require LCP to remove mercury or other hazardous substances from the chlorine tail gas prior to Kuehne receiving the chlorine tail gas from LCP during the time

Kuehne operated at the LCP site? If so, describe why Kuehne needed LCP to remove such mercury or other hazardous substances. Did Kuehne's contracts with LCP or customers contain minimum specifications for mercury contamination? If so, identify the specifications and how they were calculated and enforced.

13. Did Kuehne or its personnel handle mercury contained in materials at the site in any manner, including, without limitation, in products, raw materials, waste materials, maintenance activities or housekeeping activities? If so, describe in detail the materials that contained mercury and how Kuehne handled and disposed of the mercury contained in such materials.

14. Describe how hazardous substances were handled as a housekeeping matter, including, without limitation, how mercury or other substances were swept, wiped or cleaned off of equipment, floors or roofs during operations.

15. Describe Kuehne's air emissions, including fugitive air emissions, at the LCP site, including, without limitation, the process or processes from which the air emissions resulted and the constituents contained in each such air emission. Identify how and where these air emissions were discharged. Also, identify any permits Kuehne obtained as a result of such air emissions.

16. Did Kuehne, when it was operating at the LCP site, have any process water discharges from its operations? If so, describe the process or processes from which the process water discharges resulted and the constituents of any such discharge. Also, identify any permits Kuehne obtained as a result of such discharges and describe where each discharge originated and where the discharge ultimately terminated.

17. Did Kuehne, when it was operating at the LCP site, have any wastewater discharges from its operations? If so, describe the process or processes from which the wastewater discharges resulted and the constituents of any such discharges. Also, identify any permits Kuehne obtained as a result of such discharges and describe where each discharge originated and where the discharge ultimately terminated.

18. Did Kuehne, when it was operating at the LCP site, use cooling water in any of its processes. If so, identify how much cooling water was used by Kuehne on a daily basis, describe the process in which the cooling water was utilized and identify any part of the process that came in contact with the cooling water. Also, identify how the cooling water was discharged by Kuehne and the constituents contained in the cooling water. Identify any permits Kuehne obtained as a result of such discharges and describe where the discharge originated and where it ultimately terminated.

19. Describe all waste streams generated by Kuehne at the site, and any hazardous substances contained therein, including without limitations volume and concentration.

20. Describe any wastewater or stormwater from the Kuehne leasehold or operations that discharged to South Branch Creek, to the ground, or to ditches on the site.

21. Describe in detail, Kuehne's and LCP's business relationship during the time that Kuehne was operating at the LCP site including, without limitation, any sales contracts for the purchase of caustic soda, chlorine and other materials. Provide copies of any contracts between Kuehne and LCP or, in the event that the contracts are unavailable, describe the terms of the contracts.

22. Did Kuehne operate a chemical resale business during the time period Kuehne was operating at the LCP site? If so, for each chemical, describe its nature and volume, original providers and customers.

23. Did Kuehne ever agree to compensate LCP for any chlorine tail gas that Kuehne was unable to take from LCP during the time period Kuehne was operating at the LCP site? If so, did Kuehne ever make such payments to LCP? Identify the time period such payments were made and the amount of each such payment.

24. Did Kuehne ever sell sodium hypochlorite that it manufactured at the LCP site to any LCP customers? If so, how much sodium hypochlorite was sold to LCP customers and identify the customers to whom Kuehne sold such sodium hypochlorite.

25. Did Kuehne ever arrange for the placement of fill (including, without limitation, soils, construction material and debris that may have been used as fill) at the LCP site? If so, describe the reason, location, amounts, constituents and origins of the fill.

26. Were Kuehne's or LCP's operations at the site ever the subject of litigation, administrative proceedings, notices of civil administrative penalty assessments, police complaints or other actions? If so, describe the actions and produce all documents associated with them.

27. Did the NJDEP ever assess any penalties against Kuehne for its operation or discharges from its operations at the LCP site? If so, identify the amount of such penalties and the basis for each penalty assessed.

28. Were LCP and Kuehne ever parties to the same litigation or administrative proceeding. If so, describe the claims asserted by or against LCP or Kuehne in such litigation or administrative proceedings. Describe the outcome of the litigation or administrative proceedings and produce all documents associated with the lawsuit, including deposition transcripts and transcripts of any court proceedings.

29. Did LCP or any party ever file a complaint with the Linden Police Department regarding discharges from the Kuehne operations at the LCP site? If so, describe all actions taken by Kuehne after the filing of such complaint. Also, describe all actions taken by the Linden Police Department following the filing of such complaint. Describe the outcome of the complaint.

30. Were the buildings in which Kuehne operated connected to any sewer pipes, drain pipes, or drainage ditches located on the LCP site or neighboring sites? If so, identify each building connected to a sewer pipe, drain pipe or drainage ditch and the processes or facilities located within each building that discharged to the sewer pipe, drain pipe or drainage ditch.

31. Describe in detail any activities that Kuehne performed to install, operate, service and/or maintain the following LCP equipment or activities, provide documentation related to these activities, and describe any releases, spills or disposal of hazardous substances associated with these activities:

a. the chlorine and caustic soda pipelines from LCP;

b. LCP's storage facilities, tankers, barges, trucks, and railroad tank cars including, without limitation, the cleaning of chlorine and caustic soda from tank trailers and containers prior to transport from the Kuehne;

c. any other LCP equipment or activities.

32. Provide any documentation regarding the installation, use, maintenance, and decommissioning, if any, of the storage tanks used to store sodium hypochlorite at the LCP site.

33. With respect to the chlorine releases into the atmosphere while Kuehne was at the site, explain in detail where the releases occurred, how often they occurred and how they were abated. Please provide any record or documentation of their occurrences.

34. Identify each person having knowledge of the facts relating to Kuehne's responses to the above questions. For each person identified, provide the name, address and telephone number of that person and the basis of Kuehne's belief that he or she has such relevant knowledge.

35. Produce all documents containing any facts relating to Kuehne's responses to the above questions.

Union Carbide/Praxair (Union Carbide is defined to include Union Carbide and Praxair and any predecessors or affiliates that operated at the LCP Site.)

1. Describe the relationship between Union Carbide and LCP Chemical Company ("LCP"). Identify in your answer:

a. Any corporate relationship between Union Carbide and its affiliates and LCP and its affiliates during any time period including, without limitation, any stock ownership or contractual obligations;

b. Any officers, directors, employees, partners or shareholders (individual or corporate) who worked for or had interests in both Kuehne or its affiliates

and LCP or its affiliates (either consecutively or simultaneously), together with a description of when and what these persons' relationships were with each company, including the person's job title and job description; and

c. Any facilities or equipment that Union Carbide owned, leased, installed or built at the site.

2. Did Union Carbide ever own any stock in LCP, or did LCP ever own stock in Union Carbide? If so, identify the amount and type of stock Union Carbide owned and the time period during which stock was owned. Also, identify the method of disposition of such stock.

3. Was any corporate officer of Union Carbide involved in any way in the creation of LCP or the purchase of the site or design of site machinery? If so, identify the corporate officer, including that person's title, and describe, in detail, his/her involvement in LCP.

4. Describe any construction or capital improvements performed on the site by Union Carbide or related to the Union Carbide operations and describe any machinery or equipment owned or leased by Union Carbide located at the site.

5. Describe the process used by LCP to remove mercury from the hydrogen gas LCP supplied to Union Carbide during the time Union Carbide was operating at the LCP site. Describe how LCP disposed of the mercury removed from such hydrogen gas. Identify any contracts between Union Carbide and LCP that contained minimum specifications for mercury contamination. Identify the specifications, how they were calculated and how they were enforced.

6. Describe in detail how Union Carbide removed mercury from the hydrogen gas supplied by LCP to Union Carbide during the time when Union Carbide was operating at the LCP site. Also, describe how Union Carbide disposed of the mercury removed from the hydrogen gas. Produce all documents regarding the disposal of mercury removed from the hydrogen gas by Union Carbide.

7. Identify any employees of Union Carbide that sold any mercury removed from the hydrogen gas during the time Union Carbide operated at the LCP site. Produce all documents regarding the sale of such mercury.

8. During its operations at the LCP site, after Union Carbide removed mercury from the hydrogen gas, was there any residual mercury remaining in the hydrogen gas? If so, identify approximately how much residual mercury remained in the hydrogen gas.

9. Provide process diagrams, site drawings, sewer and wastewater conveyance locations, discharge locations and other information showing the layout of the Union Carbide leasehold and the LCP site as a whole during the time Union Carbide was present at the site, identifying which parts of the site were related to Union Carbide and which to LCP.

10. Identify where the septic tank was located on the Union Carbide leasehold. Identify the time period it was in operation. Identify the waste flows it handled. Describe, in detail, how it was decommissioned and or remediated.

11. Was any hydrogen gas emitted during the filling by Union Carbide of any containers at the LCP site? If so, identify how often such gas was emitted, approximately how much gas was emitted during each incident of emission and where the containers were located when such emissions occurred.

12. Describe the processes that generated waste oil during the time Union Carbide was operating at the LCP site including, without limitation, the waste oil contaminated with mercury identified in the attached memorandum dated November 7, 1985. Describe how such waste oil was handled and disposed of by Union Carbide.

13. Describe any air emissions, including fugitive air emissions, from Union Carbide's operations, including the process or processes from which the air emissions resulted and the constituents contained in each such air emission. Identify how and where these air emissions were discharged. Also, identify any permits Union Carbide obtained as a result of such air emissions.

14. Did Union Carbide vent any of its building to the outside when it operated at the LCP site? If so, identify (1) which parts of the building were vented; (2) why they were vented; (3) what was released from the vents; and (4) what constituents were contained in any air emissions released from the vents?

15. Did Union Carbide utilize any tanks or vessels at its leasehold or the site including, without limitation, the two LCP 4,000 gallon underground storage tanks, the LCP 1,000 gallon underground storage tank, the Union Carbide Hydrogen bladder storage tank, septic tank or leachfield or any other tank or vessel located at the site? Identify (1) the tanks or vessels; (2) what was stored in them; (3) the processes or tasks for which Union Carbide used them; and (4) how the tanks or vessels were closed, who closed them, their condition at closure and whether there ever was any evidence that there may have been releases from the tanks.

16. Describe the constituents and amounts of the caustic bath solution used by Union Carbide to strip the exterior paint from the gas cylinders during Union Carbide's operations at the LCP site. Also, identify where spent caustic bath solution was disposed and describe any releases of caustic bath solution at the site.

17. Did Union Carbide, when it was operating at the LCP site, use cooling water in any of its processes? If so, identify how much cooling water was used by Union Carbide on a daily basis, describe each process in which the cooling water was utilized and identify any part of the process that came in contact with the cooling water. Also, identify how the cooling water was discharged by Union Carbide and the constituents contained in the cooling water. Identify any permits Union Carbide obtained as a result of such discharges and describe where the discharge originated and where it ultimately terminated.

18. Describe Union Carbide's use of a run-off collection drum located on the leasehold where Union Carbide operated at the LCP site. Also, identify any discharges, and the constituents of such discharges, to this run-off collection drum during Union Carbide's operations at the LCP site, and the disposal of the contents of the drum.

19. Explain the origin of the sludge found in the run-off collection drum by Union Carbide during its ECRA investigation at the LCP site. Also, identify the constituents found in the sludge in the run-off collection drum.

20. Describe Union Carbide's use of a drywell located on the leasehold where Union Carbide operated at the LCP site. Also, identify any discharges, and the constituents of such discharges, to this drywell during Union Carbide's operations at the LCP site.

21. Identify the origin of the oil found in the drywell by Union Carbide during its ECRA investigation at the LCP site.

22. Did Union Carbide when it was operating at the LCP site have any process water discharges from its operations? If so, describe the process or processes from which the process water discharges resulted and the constituents of such discharges. Also, identify any permits Union Carbide obtained as a result of such discharges and describe where the discharge originated and where the discharge ultimately terminated.

23. Did Union Carbide, when it was operating at the LCP site, have any wastewater discharges from its operations? If so, describe the process or processes from which the wastewater discharges resulted and the constituents of such discharges. Also, identify any permits Union Carbide obtained as a result of such discharges and describe where the discharge originated and where the discharge ultimately terminated.

24. Describe any discharges by Union Carbide to an iron pipe found on the Union Carbide leasehold at the LCP site. Also, identify where these discharges originated and all constituents found in such discharges.

25. Were the buildings in which Union Carbide operated connected to any sewer pipes, drain pipes or drainage ditches located on the LCP site or neighboring sites? If so, identify each building connected to a sewer pipe, drain pipe or drainage ditch and the processes or facilities located within each building that discharged to the sewer pipe, drain pipe or drainage ditch?

26. Describe the location, use and decommissioning, and any releases from, the former hydrogen bladder storage tank, elevated storage pad and septic tank and leachfield located on the Union Carbide leasehold. Provide any and all documentation with respect to such areas, including reports, regarding installation, closure, maintenance and releases.

27. Did Union Carbide or its personnel handle mercury contained in materials at the site in any manner? Describe which of Union Carbide's products, raw materials, intermediates

or waste materials at the site may have contained mercury and describe how much mercury these materials contained. Also describe any and all procedures for handling, managing and disposing of such mercury.

28. Describe how hazardous substances were handled as a housekeeping matter, including, without limitation, how mercury or other substances were swept, wiped or cleaned off of equipment, floors or roofs during operations.

29. Describe all waste streams generated by Union Carbide at the site, and any hazardous substances contained therein including, without limitation, volume and concentration.

30. Describe any wastewater or stormwater from the Union Carbide leasehold or operations that discharged to South Branch Creek, to the ground, or to ditches on the site.

31. During the RI/FS for the LCP site, mercury contaminated filter media was discovered buried on the Union Carbide leasehold. Describe all Union Carbide processes that used filter media and the how the charcoal/carbon filter media worked within that process. Identify the amount of filter media used, its constituents and its disposal.

32. Describe all inspection and maintenance actions taken by Union Carbide with respect to institutional controls and the cap placed on the Union Carbide leasehold at the LCP site, pursuant to Union Carbide's ECRA/ISRA activities. Provide information on the construction of the cap, including base material and cap materials used, size, date of installation and diagram of location.

33. Describe, in detail, Union Carbide's and LCP's business relationship during the time period Union Carbide was operating at the site.

34. Did Union Carbide enter into any sales contracts with LCP for the purchase of hydrogen gas or other materials during the time Union Carbide was operating at the LCP site? If so, describe the nature of the sales agreement, including the time period the sales agreement was executed and the terms of each such agreement.

35. Did Union Carbide ever submit to the NJDEP a feasibility study verifying that a permanent remedial alternative was not feasible for the Union Carbide leasehold at the LCP site? If so, describe the results of that study and produce a copy of the study. If not, explain why it was not completed.

36. Did Union Carbide operate a chemical resale business during the time period Union Carbide was operating at the LCP site? If so, for each chemical, describe its nature and volume, original providers and customers.

37. Describe in detail any activities that Union Carbide performed to install, operate, service and/or maintain the hydrogen storage tank and pipeline from LCP, provide

documentation related to these activities, and describe any releases, spills or disposal of hazardous substances associated with these activities.

38. Did Union Carbide ever arrange for the placement of fill (including, without limitation, soils, construction material and debris that may have been used as fill) at the LCP site? If so, describe the reason, location, amounts, constituents and origins of the fill.

39. Did Union Carbide design and construct the buildings and other appurtances on the leasehold? If so, please provide any and all drawings related to the design and construction of these buildings and appurtances and the year of construction. Also, provide in detail the site improvements necessary at the time, including placement of fill or excavation of materials, and the source of the fill or ultimate disposal location of any materials excavated.

40. Did the NJDEP ever assess any penalties against Union Carbide for its operation or discharges from its operations at the LCP site? If so, identify the amount of such penalties and the basis for each penalty assessed.

41. Were Union Carbide's or LCP's operations at the site ever the subject of litigation, administrative proceedings, notices of civil administrative penalty assessments, police complaints or similar actions? If so, describe the actions and produce all documents associated with them.

42. Identify each person having knowledge of the facts relating to Union Carbide's responses to the above questions. For each person identified, provide the name, address and telephone number of that person and the basis of Union Carbide's belief that he or she has such relevant knowledge.

43. Produce all documents containing any facts relating to Union Carbide's responses to the above questions.

Dupont

1. Aerial photographs attached hereto demonstrate that portions of the LCP site were filled during Dupont's ownership prior to 1949. Describe and identify these and any other filling activities, the reason for the fill, the location, amounts, constituents and origins of the fill, the materials, raw materials and waste materials used at the time the property was filled.

2. Describe any landfilling conducted by Dupont on the LCP site prior to 1949. Identify the constituents in any material landfilled at the LCP site by Dupont prior to 1949.

3. Provide process information for materials being produced by Dupont during the time of the filling of the LCP site. Include information on the raw materials used and the waste material generated to make these products.

4. Identify each person having knowledge of the facts relating to Dupont's responses to the above questions. For each person identified, provide the name, address and telephone number of that person and the basis of Dupont's belief that he or she has such relevant knowledge.

5. Produce all documents containing any facts relating to Dupont's responses to the above questions.

6. Identify the name, address and telephone number of every employee of Dupont that conducted any work at the site, including filling or the landfilling of materials at the site. Also identify each person's job title and responsibilities when working at the site.

Caleb Brett

1. Describe the area on site used by Caleb Brett and the operations conducted by Caleb Brett. Provide site and process drawings for the operations. Provide the raw materials used and waste materials generated by Caleb Brett at the site.

2. Describe the relationship between Caleb Brett and LCP Chemical Company ("LCP"). Identify in your answer:

a. Any corporate relationship between Caleb Brett and its affiliates and LCP and its affiliates during any time period including, without limitation, any stock ownership, contractual obligations or shared officers or directors;

b. Any officers, directors, employees, partners or shareholders (individual or corporate) who worked for or had interests in both Caleb Brett or its affiliates and LCP or its affiliates (either consecutively or simultaneously), together with a description of when and what these persons' relationships were with each company, including the person's job title and job description; and

c. Any facilities or equipment that Caleb Brett owned, leased, built or installed at the site.

3. Describe the raw materials, intermediates, products and wastes that Caleb Brett had at the site, and identify how each hazardous substance handled or used by Caleb Brett at the site was stored and disposed of, including the name of the hazardous substance, constituents of the substance, quantity and the location where each product was disposed. Also, produce any documents regarding such disposal.

4. Describe any business relationship between Caleb Brett and LCP, including, without limitations, leases or sales agreements.

5. Describe any construction or capital improvements conducted on the site by Caleb Brett or related to the Caleb Brett operations.

6. Describe any machinery or equipment owned or leased by Caleb Brett located at the site.

7. Did Caleb Brett or its personnel handle mercury or materials containing mercury at the site in any manner including without limitation, in products, raw materials, waste materials, maintenance activities or housekeeping activities? If so, describe in detail the materials which contained the mercury and how Caleb Brett handled and disposed of such mercury or materials.

8. Did Caleb Brett ever clean or wash off mercury from the surface of any materials located at the site? If so, describe, in detail, where this cleaning and washing took place.

9. Did Caleb Brett at the LCP site test petroleum products for the presence of mercury? If so, describe, in detail, the products that were tested; how the testing was conducted on such products; the number of products tested for mercury at the site; how the tested products were handled and disposed of; and how the mercury was handled and disposed of.

10. Did Caleb Brett at the LCP site test any of the LCP products for mercury? If so, describe, in detail, the products that were tested; how the testing was conducted on such products; the number of LCP products tested for mercury; how the tested products were handled and disposed of; and how the mercury was handled and disposed of.

11. Did Caleb Brett at the LCP site test any Kuehne Chemical Company products for the presence of mercury? If so, describe, in detail, the products that were tested; how the testing was conducted on such products; the number of Kuehne products tested for mercury; how the tested products were handled and disposed of; and how the mercury was handled and disposed of.

12. Did Caleb Brett at the LCP site test any Union Cabide or Praxair products for the presence of mercury? If so, describe, in detail, the products that were tested; how the testing was conducted on such products; the number of Union Carbide or Praxair products tested for mercury; how the tested products were handled and disposed of; and how the mercury was handled and disposed of.

13. Describe all waste streams generated by Caleb Brett at the site, and any hazardous substances contained therein, including without limitations volume and concentration.

14. Describe any wastewater or stormwater from the Caleb Brett leasehold or operations that discharged to South Branch Creek, to the ground, or to any ditches located on the site.

15. Describe the location, source, volume, duration and constituents of any cooling water, stormwater, process water, wastewater or other discharges from Caleb Brett's operations including, without limitation, discharges to run-off collection drums, dry wells, LCP sewer pipes

and drainage ditches, and identify and provide copies of any permits that Caleb Brett may have obtained for such discharges.

16. Were Caleb Brett's operations at the site ever the subject of litigation, administrative proceedings, notices of civil administrative penalty assessments, police complaints or similar actions? If so, describe the actions and produce all documents associated with them.

17. Identify each person having knowledge of the facts relating to Caleb Brett's responses to the above question. For each person identified, provide the name, address and telephone number of that person and the basis of Caleb Brett's belief that he or she has such relevant knowledge.

18. Produce all documents containing any facts relating to Caleb Brett's responses to the above question.

II. Below are the companies for which EPA did not issue a 104(e) request. These companies should receive the standard 104(e) request with the additional questions listed below.

Active Water Jet

1. Describe Active Water Jet's operations at the LCP site. Provide a description of where the operations took place onsite.

2. Did Active Water Jet store any equipment at the LCP site? If so, identify the equipment stored by Active Water Jet at the LCP site, describe the use of such equipment by Active Water Jet and describe where such equipment was stored at the site.

3. Did Active Water Jet clean any equipment or vessels either owned by Active Water Jet, its customers or other third parties at the LCP site? If so, identify the equipment or vessels cleaned by Active Water Jet at the LCP site, the use of such equipment and any constituents, including metals or solvents, that would be contained in any wash water from the cleaning of any such equipment.

4. Identify all tanks, pipes, filters, condensers and similar items Active Water Jet cleaned at the LCP site. For each item cleaned, identify (1) the constituents contained in any tank cleaned; and (2) the prior use of any pipe, filter, condenser or similar item cleaned.

5. Describe any wastewater, cooling water, stormwater or other discharges from Active Water Jet's operations at the LCP site; identify the source of such discharges, their constituents, their conveyance and their discharge location; and describe and provide copies of any discharge permits.

6. Identify and describe how each waste or hazardous substance was handled, used and disposed of by the Active Water Jet at the site, including the name of the waste or hazardous

substance and its constituents, quantity and disposal location. Provide a drawing or description of the location where liquid waste was disposed of on the LCP site by Active Water Jet.

7. Describe any construction or capital improvements conducted on the site by Active Water Jet or related to the Active Water Jet operations.

8. Describe any machinery or equipment owned or leased by Active Water Jet located at the site.

9. Describe any business relationship between Active Water Jet and LCP Chemical Company ("LCP"), including, without limitations, leases or sales agreements.

10. Describe any corporate relationship between Active Water Jet and LCP, including any relationship with any parent, subsidiary, affiliate or related company of LCP, during any time period.

11. Did Active Water Jet or its personnel handle mercury or materials containing mercury at the site in any manner, including, without limitation, in products, raw materials, waste materials, maintenance activities or housekeeping activities? If so, describe, in detail, the materials that contained mercury and how Active Water Jet handled and disposed of such mercury or materials.

12. Did Active Water Jet ever clean or wash off mercury from the surface of any materials located at the site? If so, describe the location of where such washing or cleaning took place at the site.

13. Describe any wastewater or stormwater from the Active Water jet leasehold or operations that discharged to South Branch Creek, to the ground, or to ditches on the site.

14. Describe any administrative or litigation proceedings concerning Active Water Jet's operations or business at the site.

15. Identify each person having knowledge of the facts relating to Active Water Jet's responses to the above questions. For each person identified, provide the name, address and telephone number of that person and the basis of Active Water Jet's belief that he or she has such relevant knowledge.

16. Produce all documents containing any facts relating to Active Water Jet's responses to the above questions.

Microcell Technologies

1. Describe Microcell's operations at the LCP site. Provide a site plan showing where the operations occurred.

2. Did Microcell, when it was operating at the LCP site, have any air emissions, including fugitive air emissions, from its operations? If so, describe the process or processes from which the air emissions resulted and the constituents of the air emissions. Identify how and where the air emissions were discharged. Identify and provide copies of any permits Microcell obtained as a result of such air emissions.

3. Describe any wastewater, cooling water, stormwater or other discharges from Microcell's operations at the LCP site; identify the source of such discharges, their constituents, their conveyance and their discharge location; and describe and provide copies of any discharge permits.

4. Identify and describe how each waste or hazardous substance was handled, used and disposed of by the Microcell at the site, including the name of the waste or hazardous substance and its constituents, quantity and disposal location.

5. Describe any construction or capital improvements conducted on the site by Microcell or related to the Microcell operations.

6. Describe any machinery or equipment owned or leased by Microcell located at the site.

7. Describe any business relationship between Microcell and LCP Chemical Company ("LCP"), including, without limitations, leases or sales agreements.

8. Describe any corporate relationship between Microcell and LCP, including any relationship with any parent, subsidiary, affiliate or related company of LCP, during any time period.

9. Did Microcell or its personnel handle mercury or materials containing mercury at the site in any manner, including, without limitation, in products, raw materials, waste materials, maintenance activities or housekeeping activities? If so, describe, in detail, the materials that contained the mercury and how Microcell handled and disposed of such mercury or materials.

10. Describe all waste streams generated by Microcell at the site, and any hazardous substances contained therein, including without limitations volume and concentration.

11. Describe any wastewater or stormwater from the Microcell leasehold or operations that discharged to South Branch Creek, to the ground, or to ditches located on the site.

12. Describe any administrative or litigation proceedings concerning Microcell's operations or business at the Site.

13. Identify each person having knowledge of the facts relating to Microcell's responses to the above questions. For each person identified, provide the name, address and

telephone number of that person and the basis of Microcell's belief that he or she has such relevant knowledge.

14. Produce all documents containing any facts relating to Microcell's responses to the above questions.

NOPCO

1. Describe NOPCO's operations from 1961 to 1964 at its facility in Linden, New Jersey. Provide a drawing or site plan showing the location of the facility in relation to the LCP site.

2. Did NOPCO, at its facility in Linden, New Jersey, have any air emissions from its operations? If so, describe the process or processes from which the air emissions resulted and the constituents of the air emissions. Identify how and where the air emissions were discharged. Also, identify any permits NOPCO obtained as a result of such air emissions.

3. Describe any wastewater, cooling water, stormwater or other discharges from NOPCO's operations; identify the source of such discharges, their constituents, their conveyance and their discharge location; and describe and provide copies of any discharge permits.

4. Identify and describe how each waste or hazardous substance was handled, used and disposed of at or by the NOPCO facility, including the name of the waste or hazardous substance and its constituents, quantity and disposal location.

5. Describe any business relationship between NOPCO and LCP Chemical Company ("LCP"), including, without limitations, leases or sales agreements.

6. Describe any corporate relationship between NOPCO and LCP, including any relationship with any parent, subsidiary, affiliate or related company of LCP, during any time period.

7. Did NOPCO or its personnel handle mercury or materials containing mercury at its facility located in Linden, New Jersey, including, without limitation, in products, raw materials, waste materials, maintenance activities or housekeeping activities? If so, describe, in detail, the materials that contained mercury and how NOPCO handled and disposed of such mercury or materials.

8. Describe all waste streams generated by NOPCO at its facility located in Linden, New Jersey, and any hazardous substances contained therein, including without limitations volume and concentration.

9. Identify each person having knowledge of the facts relating to NOPCO's responses to the above questions. For each person identified, provide the name, address and

telephone number of that person and the basis of NOPCO's belief that he or she has such relevant knowledge.

10. Produce all documents containing any facts relating to NOPCO's responses to the above questions.

ASHTA Chemicals

1. Describe any corporate relationship between Ashta Chemicals and LCP Chemical Company ("LCP") or any subsidiary, parent, successor or predecessor corporation or any related or affiliated company of LCP.

2. Describe any business dealings between Ashta Chemical and LCP or any subsidiary, parent, successor or predecessor corporation or any related or affiliated company of LCP.

3. Identify each person having knowledge of the facts relating to Ashta Chemical's responses to the above questions. For each person identified, provide the name, address and telephone number of that person and the basis of Ashta Chemical's belief that he or she has such relevant knowledge.

4. Produce all documents containing any facts relating to Ashta Chemical's responses to the above questions.

Linden Roselle

1. Describe the Linden Roselle operations at its facility located in Linden, New Jersey.

2. Describe any spills, leaks or discharges that have taken place at the Linden Roselle facility in Linden, New Jersey.

3. Describe any wastewater, cooling water, stormwater or other discharges from Linden Roselle's operations; identify the source of such discharges, their constituents, their conveyance and their discharge location; and describe and provide copies of any discharge permits.

4. Identify how each hazardous substance handled or used at the Linden Roselle facility was disposed of by Linden Roselle, including the name of the hazardous substance, the constituents found in the material, the quantity of each hazardous substance disposed of and where each product was disposed of by Linden Roselle. Also, produce any documents regarding such disposal.

5. Describe any business relationship between Linden Roselle and LCP Chemical Company ("LCP"), including, without limitations, leases or sales agreements.

6. Describe any corporate relationship between Linden Roselle and LCP, including any relationship with any parent, subsidiary, affiliate or related company of LCP, during any time period.

7. Identify each person having knowledge of the facts relating to Linden Roselle's responses to the above questions. For each person identified, provide the name, address and telephone number of that person and the basis of Linden Roselle's belief that he or she has such relevant knowledge.

8. Produce all documents containing any facts relating to Linden Roselle's responses to the above questions.